



November 26, 2024

VIA ECF

Daniel J. Luccaro

Direct Phone 215-665-6968

Direct Fax 215-701-2368

dluccaro@cozen.com

The Honorable James K. Bredar
United States District Court For the District of Maryland
101 West Lombard Street
Baltimore, MD 12201

**Re: In the Matter of the Petition of Grace Ocean Private Limited, et al
for Exoneration from or Limitation of Liability
Case No.: 1:24-cv-00941-JKB**

Dear Judge Bredar:

Cozen O'Connor represents Claimant Ace American Insurance Company in this matter. On November 8, 2024, the parties submitted a Joint Proposed Protective Order for the Court's consideration (ECF #440-1). The Court approved the proposed order and on November 13, 2024, issued Case Management Order No. 4 – Protective Order (ECF #440).

In connection with this litigation, the National Transportation Safety Board ("NTSB") has produced various documents from its investigation to the parties pursuant to a Protective Agreement. Paragraph 13 of the NTSB Protective Agreement requires that the parties "petition the Court for a protective order consistent with the terms of this protective agreement."

The Joint Proposed Protective Order previously submitted by the parties was intended to comply with Paragraph 13 of the NTSB Protective Agreement. However, after it was filed, the NTSB advised that it was concerned that the Protective Order did not adequately cover its documents. The parties have since worked with the NTSB to come up with an agreed revised protective order to address the NTSB's concerns with the original protective over.

The parties now submit the attached First Amended Joint Proposed Protective Order for the Court's consideration and filing. This has been agreed to by Claimants, Petitioners and the NTSB.

Thank you for your consideration of the First Amended Joint Proposed Protective Order.

Respectfully Submitted,

COZEN O'CONNOR

A handwritten signature in black ink, appearing to read "D. Luccaro", written over a horizontal line.

BY: DANIEL J. LUCCARO

The Honorable James K. Bredar
November 26, 2024
Page 2

Cc: All counsel (via ECF)